



Texas Gulf Coast Natural Resource Damage Assessment and Restoration Program

c/ TAMU-CC, 6300 Ocean Dr Unit 5837, Corpus Christi TX 78412-5837

(361) 994-9005 (361) 994-8262 fax

Memo

To: Jessica White
From: Tammy Ash, Keith Tischler
CC:
Date: 10/14/2008
Re: Comments on the revised Draft Remedial Investigation Work Plan of the Star Lake Canal Superfund Site

United States Fish and Wildlife Service and the Texas General Land Office would like to provide the following comments.

General comments

1. While the revised draft does state that additional sampling will be performed in Tier 2 if the presence of COCs posing ecological risk is found at locations from Tier 1, this does not entirely address our concern regarding adequacy of the Tier 1 sampling. One of our concerns is that certain areas within the "potential area of concern" are not being sampled at all (see our previous comments on Molasses Bayou especially the southeast corner, wetlands adjacent to the canal, and the confluence with Neches River). There are several portions of the site not represented by even a single sample of any media. If an area is never sampled in Tier 1, why would Tier 2 sampling occur in that area if there will be no Tier 1 samples to indicate levels at ecological risk? We feel more samples are needed in this area since the revised draft failed to provide justification or clarification of the current sampling plan. For example, we requested a minimum of 2 samples be added to the Molasses Bayou area to increase coverage. Instead the revised draft shows one sample was moved from one location to another, and none were added.

Secondly, we expressed concern that portions of the sampling plan (ie sediment and surface water in Jefferson Canal) have too few samples for the distance represented. Again the revised draft fails to provide justification for location and number of samples. Additional surface sediment samples should be added to the proposed Star Lake Canal and Molasses Bayou sample suite to ensure effective geographic coverage. The historical data provided and utilized to develop the proposed sampling locations supports the need for greater spatial coverage given that data's limited coverage and restricted utility (Section 2.1). The proposed sample locations along Star

Lake Canal are spaced sufficiently far apart as to miss contaminant hotspots of significant size (i.e., 900 ft), as are those within the interior of Molasses Bayou. Based upon the historical rationale cited, additional samples should also be provided within Molasses Bayou to address sediment transport and deposition resulting from flood stage sheet flow (Section 6.2.1.3) which may remobilize contaminated sediments into areas (identified as intervening marshland) that do not represent established channels or canals.

2. The revised document fails to address the criteria previously identified by the Trustees of habitat suitability as the basis for inclusion of threatened and endangered (T&E) species in the evaluation of potential receptor species. Text indicating the observed occurrence of T & E species as criteria for inclusion remains (Section 3.4) in conflict with the Trustee comment. Pending concurrence from Texas Parks and Wildlife and the US Fish and Wildlife Service on the proposed receptor list is insufficient justification to omit T&E species that may occur from the preliminary list. Additionally the Brown Pelican has not been added as a potential receptor as requested in prior Trustee comments.

Specific comments

1. Section 3.3 page 3-3: Frequency of detection should not be used at the Tier 1/SLERA level to remove contaminants from further assessment in the Tier 2/BERA if they exceeded the ecological screening benchmark. Site-specific adjustments based upon contaminant distribution, frequency, and receptor use of affected habitat may be made during the BERA.

2. Section 3.4.2 pages 3-10-3-11: We resubmit the following comments which the revised draft has not addressed: *The characterization of the muskrat exposure in the text is incorrect. Muskrats are primarily aquatic animals, burrowing into the sediments of marshes or river banks or shorelines. They feed primarily on aquatic vegetation. Therefore they will be exposed to contaminants primarily through aquatic vegetation, surface water and sediments, not soil as the report indicated. Please revise accordingly.*

3. Section 3.4.2 page 3-10: It is unlikely much information will be available to estimate risk to the white-faced ibis, therefore we suggest using a surrogate species. The RI Work Plan should indicate which surrogate species will be used, and should discuss using conservative assumptions (NOAELs) for the selected surrogate.

4. Section 3.6.1 pages 3-12-3-14: Although the text states that shorebirds will be exposed to bank soils, the conceptual exposure model for the site lists the pathways for shorebirds and waterfowl as incomplete. Please revise. Please revise the food web also showing more utilization of the "wetland" and "bank soil."



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